

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FREDERICK KERNER and	:	CIVIL ACTION
LINDA DIANE KERNER, h/w	:	
	:	
v.	:	02-CV-4728
	:	
SIGNODE CORPORATION	:	

**DEFENDANT'S PRETRIAL DISCLOSURES**

**A. WITNESS LIST**

Michael J. Brown, Signode Corporation

Robert Kresge, Signode Corporation

Janusz Figiel, Signode Corporation

James Franklin, Signode Corporation (via deposition)

Arnold Keith Glenn, Signode Corporation (via deposition)

Willis Hall, Signode Corporation (via deposition)

Michael Marien, Signode Corporation (via deposition)

Michael Putnam, Signode Corporation (via deposition)

Jeddie Stone, Signode Corporation (via deposition)

Daniel Boggs, Signode Corporation (via deposition)

Vance Reneman, Signode Corporation (via deposition)

Dennis Jones, U.S. Steel Corporation

Gary Pirozzola, former U.S. Steel Corporation

Michael Yack, former U.S. Steel Corporation

Dennis Jones, U.S. Steel Corporation

Mark Cebrick, U.S. Steel Corporation

Charles Stoneacker, U.S. Steel Corporation

Frederick Kerner, plaintiff

Linda Diane Kerner, plaintiff

Randall W. Culp, M.D., The Philadelphia Hand Center, 700 S. Henderson Road, Suite 200, King of Prussia, PA 19406

David Pope, Ph.D.  
University of Pennsylvania  
Material Science  
200 LRSM Building, Room 200  
3231 Walnut Street  
Philadelphia, Pa. 19104-6202

Irene Mendelsohn  
1226 Woodbine Avenue  
Penn Valley, PA 19072-1243

Gary Barach, CPA CFE  
1704 Locust Street  
Philadelphia, PA 19103-6107

Dr. Emil Matarese

Custodian of Records of U.S. Steel

Custodian of Records of Yardley Medical

Custodian of Records of Dr. Kajeski

Custodian of Records of Delaware Valley Medical Center

Custodian of Records of University of Pennsylvania Health System Radiology Dept.

Custodian of Records of Jefferson Imaging

Custodian of Records of Dr. Emil Matarese

Custodian of Records of Health South

Custodian of Records of Drs. David and Marc Lamb

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Custodian of Records of Dr. Leatherwood

All witnesses identified in plaintiff's Pretrial Disclosures

**B. EXHIBIT LIST**

1. All expert reports and CV of Dr. David Pope and all exhibits attached thereto and any documents referenced therein.
2. All expert reports and CV of Janusz Figiel and all exhibits attached thereto and any documents referenced therein.
3. All expert reports and CV of Dr. Irene Mendelsohn and all exhibits attached thereto and any documents referenced therein.
4. All expert reports and CV of Gary Barach and all exhibits attached thereto and any documents referenced therein
5. U.S. Steel Fairless Works – Serious Incident w/o Injury Report 7-20-00
6. U.S. Steel Accident Report
7. Signode General Hand Tool & Strapping Safety Manual
8. Signode Operation, Parts & Safety Manual RCD-1431-3431
9. Signode's RCD-1435 Manual Notching Tool
10. E-mail from Mark Cebrick of U.S. Steel to other U.S. Steel Managers dated 7-19-00
11. U.S. Steel report of third turn July 19, 2000, prepared by Mark Cebrick
12. Tool Drawings including but not limited to P253106, P253105 and P020371
13. RCD1431 sealer inspection check list
14. Manual sealer specifications
15. Signode warning sign
16. Earlier version of drawing P-20371 which identified pre-CAD changes
17. Any and all drawings predating the change to computer assisted drawings related to the improvements of the handles on the sealers
18. Design diagram P020371

19. Documentation regarding change order numbers 52320 and 52430
20. Change Orders for tool
21. Anatomical drawings
22. U.S. Steel Employment Records for Frederick Kerner including payroll history
23. Signode Hand Tool Safety Video
24. Video taken by Mr. Clauser at U.S. Steel
25. Photos taken at U.S. Steel by defense counsel and Mr. Clauser
26. Representative tools
27. Damaged tools
28. Four tools examined by Dr. Pope
29. Repair records
30. Defendant's Requests for Admissions directed to plaintiff and plaintiff's responses and supplemental responses thereto
31. Defendant's Interrogatories and Request for Production of Document directed to plaintiff and plaintiff's responses thereto
32. Product drawings
33. All exhibits marked and identified at depositions taken in case
34. All exhibits identified in plaintiffs' Pretrial Disclosures
35. Frederick Kerner Income Tax Returns
36. U.S. Steel Medical Records/File regarding Frederick Kerner
37. All Medical Records attached as Exhibits to Defendant's Request for Admissions to Plaintiff
38. All Records of U.S. Steel regarding Frederick Kerner's accidents at U.S. Steel

39. ASM Metals Handbook, 1996 Edition, Volume 19.

**WHITE AND WILLIAMS LLP**

By:

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Michelle D. Coburn, Esquire  
Attorney I.D. No. 15654/62987  
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Philadelphia, PA 19103-7395  
(215) 864-7037/6355  
*Attorney for Defendant,  
Signode Corporation*

Dated: October 17, 2003

**CERTIFICATE OF SERVICE**

I, Michelle D. Coburn, Esquire, hereby certify that I have served the attached Defendant's Pretrial Disclosures on this date to be served via United States First Class Mail upon the parties listed below:

Rosemary Pinto, Esquire  
Feldman & Pinto, P.C.  
1604 Locust Street, 2R  
Philadelphia, PA 19103

**WHITE AND WILLIAMS LLP**

By: \_\_\_\_\_

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*Attorney for Defendant,  
Signode Corporation*

Dated: October 17, 2003